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June 1, 2018

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Rm TW-A325
Washington, DC 20554

Re: *Notice of Ex Parte*: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123.

Dear Ms. Dortch:

On May 30, 2018, Robert Felgar, CEO of RAZ Mobility, LLC, met with Nirali Patel of Chairman Pai's Office.

Mr. Felgar urged the Commission to add language in the Notice of Inquiry ("NOI") section of the proposed *Order*¹ that requests comment on whether there are new technologies that should be supported as telecommunications relay services. Further, the NOI should ask whether those new technologies offer functional equivalency and whether they reduce costs compared to IP CTS.

Mr. Felgar noted that in the very near future companies will offer solutions that personalize smartphone audio based on a user's personal hearing profile. An audio personalization service offers the ultimate in functional equivalency since it allows hard of hearing individuals to place and receive phone calls without using captions. Further, audio personalization services are less expensive than either existing IP CTS service or the use of automatic speech recognition ("ASR").

Mr. Felgar explained that supporting certain services, like ASR, while not supporting other innovative services, such as audio personalization services, would violate 47 U.S.C. § 225(d)(2), which directs the Commission not to "discourage or impair the development of improved technology." New technologies, such as audio personalization services, will have difficulty surviving if they do not receive support, while other competing technologies, such as ASR, do receive support.

¹ See *In re Misuse of Internet Protocol (IP) Captioned Telephone Service*, Report and Order and Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC-CIRC1806-10 (May 17, 2018) ("Order").

RAZ Mobility thanks the Commission for its efforts to improve telecommunications relay services.

Sincerely,

Robert Felgar, CEO

cc: Karen Peltz Strauss
Nirali Patel
Bob Aldrich
Eliot Greenwald
Michael Scott